

FILED
JODGED
RECEIVED

MAIL

JAN 21 2014

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY

MICHAEL A. LEON
444 W. Orange Grove Road, #1136
Tucson, Arizona 85704
(520) 256-8457

Email: Michael1Lion@yahoo.com

Plaintiff Pro Se

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF WASHINGTON

MICHAEL A. LEON,

Plaintiff,

vs.

EXPONENT, INC. d/b/a DELAWARE
EXPONENT, INC., THE BOEING
COMPANY, FIONA GRIEG, MARC
BIRTEL, JOHN DOE 1-50; MARY ROE 1-
50; XYZ CORP 1-50; ABC LLC 1-50; The
names of the "John Doe 1-50" "Mary Roe 1-
50", "XYZ Corp, 1-50", and "ABC LLC, 1-
50", defendants being fictitious, and unknown
to the Plaintiff,

Defendants.

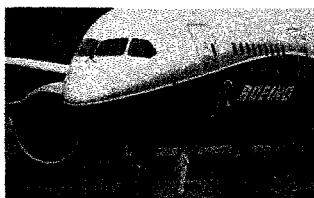
C14-0095 *LAJ*
Case No.

COMPLAINT DEFAMATION FALSE
LIGHT INVASION OF PRIVACY
EMOTIONAL DISTRESS

JURY TRIAL DEMANDED BY
PLAINTIFF PURSUANT TO FED. R.
CIV. P. 38 (A),(B)& (C) - PLAINTIFF
HEREBY DEMANDS A TRIAL BY
JURY ON ALL ISSUES

Boeing keeps claiming no battery issues –
Exponent report states improper test setup
Constant redesigns 2013 and 1/14/2014

One year later almost to the day, yesterday lithium ion battery issues Dreamliner -
1/14/2014 Japan Airlines grounds Boeing Dreamliner after battery issue.¹



14-CV-00095-CMP

¹ **Plane grounded after white smoke is seen coming from battery system is latest incident to plague Boeing's Dreamliner The most recent incident occurred almost a year exactly after the global Dreamliner fleet was controversially grounded by regulators following several incidents also related to batteries.** <http://www.telegraph.co.uk/finance/newsbysector/transport/10572249/Japan-Airlines-grounds-Boeing-Dreamliner-after-battery-issue.html> **Boeing said it was 'aware of the 787 issue that occurred Tuesday afternoon at Narita, which appears to have involved the venting of a single battery cell'**

1 A spokesman for JAL told the Telegraph: "The aircraft is still grounded and will be until
2 the battery system and other related parts has been completely changed." Contrary to Golder
3 Ranch Fire Investigation report, Exponent has issued defamatory report stating that I am
4 responsible for the lithium ion battery explosion.^{2 3 4 5} I have a right to review this report and

5 ² Japan Airlines has grounded one of its fleet of Boeing 787 Dreamliners after white smoke was spotted streaming
6 out of the battery system in a pre-departure maintenance check.
7 The aircraft, which was parked at Tokyo's Narita airport and was scheduled to leave for Bangkok, is believed to have
8 suffered a technical problem relating to a battery cell leakage.
9 A warning sign for the battery system problem was detected by a maintenance worker in the cockpit of the plane,
10 while white smoke was reportedly spotted outside the window.
11 "The safety pressure relief valve connecting to one battery cell out of eight was found to have opened, it was found
12 that liquid had dispersed in the main battery enclosure," said a statement from Japan Airlines (JAL).
13 The incident is likely to reignite safety concerns surrounding the Boeing 787 Dreamliner, which was hailed as the
14 aircraft of the future when it was first unveiled but has encountered a string of technical issues since its first
15 commercial flight in 2011.

16 ³ In January 2013, the FAA grounded all 787s after **two battery fires developed on parked aircraft**
17 **in Boston. In July, an Ethiopian Airlines 787 caught fire due to a faulty emergency beacon.**
18 **Norwegian Air Shuttle grounded its fleet because of oxygen supply, brake, and hydraulic pump**
19 **issues. Finally, last month, a Polish-owned 787 was grounded after the system that identifies planes**
20 **to air traffic controllers malfunctioned. That's a long year for Boeing's engineers, and fear of engines**
21 **icing up doesn't help matters.** [http://247wallst.com/aerospace-defense/2013/11/26/boeing-ge-
22 engine-icing-risk-prompts-faa-directive/](http://247wallst.com/aerospace-defense/2013/11/26/boeing-ge-engine-icing-risk-prompts-faa-directive/)

23 Boeing, GE Engine Icing Risk Prompts FAA Directive
24 By Paul Ausick November 26, 2013 7:15 am EST

25 ⁴ <http://www.courthousenews.com/2012/03/13/44660.htm> **Ecuador Beats Privilege Claims to Access**
26 **Chevron Docs**

27 A federal judge granted discovery in September, but Ecuador claimed that Chevron improperly withheld
28 nearly 2,000 documents as privileged.

After reviewing approximately 1,900 documents *in camera*, U.S. Magistrate Judge Nathanael Cousins ruled that certain documents do not meet the criteria for work-product protection under federal law.

These documents include communications between non-attorney Chevron employees and Kelsh, as well as "notes, task lists, outlines, memoranda, presentations and draft letters authorized by Kelsh and/or Exponent, non-attorney Chevron employees, and other testifying experts from the Lago Agrio litigation."

Cousins' order extends to communications between Kelsh and third-party consultants, as well as other "retained and non-retained experts, including those incorrectly labeled as 'draft reports.'"

Chevron, Kelsh and Exponent must produce the documents by April 4.

[http://cdn.nextgov.com/nextgov/interstitial.html?v=2.1.1&rf=http%3A%2F%2Fwww.
nextgov.com%2Femerging-tech%2F2013%2F01%2F2006-battery-fire-destroyed-
boeing-787-suppliers-facility%2F60809%2F](http://cdn.nextgov.com/nextgov/interstitial.html?v=2.1.1&rf=http%3A%2F%2Fwww.nextgov.com%2Femerging-tech%2F2013%2F01%2F2006-battery-fire-destroyed-boeing-787-suppliers-facility%2F60809%2F)

Leon said Securaplane dismissed him while he was engaged in "protected activity relating to air safety concerns that he brought to the attention of both Securaplane management and the FAA." The company said that Leon, among other things, was a convicted felon who lied to fire investigators, falsified his employment history and violated company email and Internet policies. Lithium ion battery safety issues due to explosion which maimed Michael Leon. Defendants

see false light report disseminated to third parties and recover damages. The public has a right to know and journalists as well. Plaintiff Michael A. Leon ("Plaintiff") brings this Complaint for violation of Title VII of the Civil Rights Act of 1964 against EXPONENT, FIONA GRIEG, MARC BIRTEL, THE BOEING COMPANY, JOHN DOES 1-50; MARY ROES 1-50; XYZ CORPORATIONS 1-100; The names of the "John Doe 1-50" "Mary Roe 1-50", "XYZ Corp, 1-50", and "ABC LLC, 1-50", defendants being fictitious, and unknown to the Plaintiff ("Defendants") and states the following:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. § 1332, as the plaintiff MICHAEL A. LEON and defendants are from different states and the amount in controversy exceeds \$75,000 exclusive of interest and costs. Plaintiff does not want the action in Arizona conflict with US District Court subject of Ninth Circuit action Section 1983.

2. Venue in this District is proper pursuant to 28 U.S.C. § 1391, in that the defendants or their agents, or certain of them, reside or may be found here, a substantial part of the events giving rise to plaintiffs' claims occurred here, and the defendants transact business here.

3. This Court enjoys venue under 28 U.S.C. § 1391(a)(2) because all or a substantial portion of the events that gave rise to Plaintiff's claims transpired nationally and internationally, including the publication or republication of the defamatory falsehoods and the damage to Plaintiff's reputation.

4. This Court enjoys venue under 28 U.S.C. § 1391(a)(2) because all or a substantial portion of the events that gave rise to Plaintiff's claims transpired nationally and internationally, including the publication or republication of the defamatory falsehoods and the damage to Plaintiff's reputation by Marc Birtel Director, Media Relations at Boeing Commercial Airplanes since 2011. **Exhibit E.** This defamatory report, statements performed by the California offices of Exponent Menlo Park, California. Dr. Celina Mikolajczak is believed to have written report upon. Dr. Michael Boost collaborated with her as the Director of Technology. Fiona Grieg, a DC resident, political candidate stated falsehoods about Plaintiff. **Exhibit F.**

THE PARTIES

have continually stated that nothing was wrong with the battery and that Michael Leon was at fault for explosion even in light of the redesign of the battery last year and constant problematic issues with Boeing aircraft. Grounding of planes, fatal crashes in the last year.

⁵ <http://www.reuters.com/article/2013/07/26/us-boeing-faa-penalty-idUSBRE96P0XP20130726>

FAA seeks \$2.75 million quality control penalty for Boeing unit

5. Plaintiff, Michael A. Leon is a disabled pro se litigant receiving social security benefits. Mr. Leon is a former employee of Securaplane Technologies subcontractor of The Boeing Company relative to the Dreamliner lithium ion battery. Mr. Leon resident of Pima County, State of Arizona.
6. Defendant, EXPONENT maintains office in Menlo Park, California.
7. Defendant, FIONA GRIEG domiciled in District of Columbia.
8. Defendant THE BOEING COMPANY is in Chicago, IL.
9. MARC BIRTEL, domiciled in Seattle, Washington.
10. The names of the "John Doe 1-50" "Mary Roe 1-50", "XYZ Corp, 1-50", and "ABC LLC, 1-50", defendants being fictitious, and unknown to the Plaintiff

STATEMENT OF FACTS

10. This is an action to recover damages and civil penalties arising out of defamation invasion of privacy. On January 22 2013 next gov Fiona Greigg stated Plaintiff was a convicted felon perpetuating negativity in an attempt to further discredit Plaintiff concerning safety concerns. Boeing and Fiona Griegg (spokesperson for all of the defendant companies in articles) stated that I was fired for internet email violation when the decision of Judge Dorsey states otherwise. Exponent has been issuing report and statements for years that I was responsible for lithium ion battery explosion despite Dreamliner Boeing issues this entire years pertaining to battery and safety of their products in general. Boeing Securaplane accused me of lying to FAA investigators. On January 22, 2013 Boeing spokesman Marc Birtel said the 2006 fire resulted from "an improper test set up, not the design of the battery." This statement was based on the Exponent report prepared for Boeing and what Marc Birtel is relying upon. Plaintiff and the public have a right to see this report. The Decision did not state I was a convicted felon and I am not. Right to Sue letters exhibits attached herein.

http://cdn.nextgov.com/media/gbc/docs/pdfs_edit/012213bb1a.pdf <http://www.nextgov.com/emerging-tech/2013/01/2006-battery-fire-destroyed-boeing-787-suppliers-facility/60809/>

Exhibit A.

<http://www.reuters.com/article/2013/01/21/us-boeing-securaplane-idUSBRE90J0B320130121> **Exhibit G.**

12. As a proximate result of the above-described publication, plaintiff has suffered loss of his reputation, shame, mortification, and injury to his feelings inflicting emotional distress, in an amount to be established by proof at trial.
13. The above-described publication was not privileged because it was published by defendants with evil intent, *mens rea*, state of mind and facts supporting the allegation, for example: malice, hatred and ill will toward plaintiff and the desire to injure him and prejudice him at trial, in that defendants had expressed a desire to "get" plaintiff. Because of defendants' malice in publishing, plaintiff seeks punitive damages in a total amount to be established by proof at trial]. A reasonable person would be highly offended referred to as lookout, scary unjustifiably. Job 2:28 Nahum 1:9 ► Whatever they plot against the LORD he will bring to an end; trouble will not come a second time.

ALJ William Dorsey stated that engineering Ph.ds were expert witnesses in his courtroom proceeding. Dr. Michael Boost testified as an expert witness as well as Dr. Dr. Jung-Hui Cheng. Dr. Cheng did not rely on report, however, Dr. Michael Boost relied on Exponent analysis report during testimony which was never produced prior to trial, during trial or any other litigations despite repeated requests. This report according to Dr. Michael Boost defames Michael A. Leon. Dr. Boost lied about position with Securaplane one way or the other due to contradictory statements. The first day of trial he states he is employed by Securaplane, then he is not, then on the fourth day of trial states that he is employed by Securaplane. This report was disseminated to third parties and Applicants have a right to this discovery item. Countless years have been wasted in multiple jurisdictions attempting to extract this critical piece of evidence concerning Dreamliner lithium ion battery explosion and destruction of Boeing subcontractor Securaplane in Tucson, Arizona on November 7, 2006. Dr. Celina Mikolajczak is believed to have written report upon. Dr. Michael Boost collaborated with her as the Director of Technology. <http://www.exponent.com/> and Dr. Celina Mikolajczak have no problem disclosing all other works regarding lithium ion battery on website as well as referencing in LinkedIn.⁶ Exhibit 1a.

⁶ Celina Mikolajczak's Publications

- ***Lithium-ion batteries hazard and use assessment***

- The Fire Protection Research Foundation
- July 2011

Authors: Celina Mikolajczak, Michael Kahn, Richard (Tom) Long Jr., Kevin White

- ***Methodologies for battery failure analysis***

- In: Linden's Handbook of Batteries, 4th Edition. Reddy T (ed), McGraw Hill
- 2011

Authors: Celina Mikolajczak, Quinn Horn, Daren Slec, Surendra Singh, Troy Hayes, John Harmon, Ramesh Godithi, Kevin White, Ming Wu, Marcus Megerle

- ***Detecting lithium-ion cell internal fault development in real time***

- Power Electronics Technology
- March 2010

Authors: Celina Mikolajczak, John Harmon, Quinn Horn, Kevin White, Ming Wu, Kamal Shah

- ***US FAA-style flammability assessment of lithium-ion batteries packed with and contained in equipment (UN3481).***

- March 2010

Authors: Celina Mikolajczak, John Harmon, Priya Gopalakrishnan

- ***US FAA-style flammability assessment of lithium ion cells and battery packs in aircraft cargo holds.***

- April 2005

Authors: Celina Mikolajczak, Alex Wagner-Jauregg

- ***Effect of cell state-of-charge on outcome of internal cell faults: preliminary report.***

- August 2004

Authors: Celina Mikolajczak, Marcus Megerle, J. Ashley Kelley

- ***Lithium-Ion Battery Hazards***

- Fire Protection Engineering
- October 8, 2012

Authors: Celina Mikolajczak, Richard (Tom) Long Jr., Michael Kahn

The Fire Protection Research Foundation (FPRF) completed an assessment of the hazards associated with Li-ion batteries related to storage of Li-ion batteries and fire protection; this article provides a brief overview of this work to-date.¹ Before the global fire safety challenges associated with Li-ion batteries can be addressed, an understanding of Li-ion technology is useful and follows.

Celina Mikolajczak's Languages

- **English**

(Native or bilingual proficiency)

However, as in the Chevron matter Exponent is resistant to relinquish discovery. Moreover where the information sought is relevant to cases, the information is to be produced as opposed to withheld. When the information sought is relevant, it is "presumptively discoverable" under Section 1782. In re Bayer AG, 146 F.3d 188, 195-96 (3d Cir. 1998). It provides an efficient means for federal courts to assist litigants. In re Clerici, 481 F.3d 1324, 1331(11th Cir. 2007). District Courts have broad discretion to apply Section 1782 to achieve these goals. See Intel, 542 U.S. at 252. The documents requested in this Application further the above goals and are patently relevant to the dispute issues in the Leon and Bernstein proceedings. Pursuant to the express statutory requirements, Exponent is required to produce this document and evidence relied upon when generating report. Journalists have questioned. Boeing Securaplane tactics and defamation against Michael Leon have now come full circle. There have been deaths as a result of 777 on July 6, 2013 and constant grounding relative to 787, constant groundings Dreamliner this year, redesign of battery and fatal Moscow 737 plane crash in November 2013 killing all.^{7 8}

- **French**
(Limited working proficiency)

- **Polish**
(Elementary proficiency)

Celina Mikolajczak's Certifications

- **Professional Engineer in Mechanical Engineering (P.E.)**

Board for Professional Engineers and Land Surveyors
License M32733
January 2004 to June 2012

- **Hazardous Waste Operations and Emergency Response Training**

in accordance with Cal-OSHA Title 8 GISO 5192 & 29CFR1910.120

⁷Exhibit 1 Transcript Leon Vol. 4: A The root cause analysis took approximately two years, give or take, I don't have the exact dates. A lot of evidence was gathered. Oh, I neglected to name one company that was part of the investigation, named Exponent. It's Exponent, based in California. They're --

Q Are they a consultant?

A Yeah. They're -- they're -- they're a rather large company. Their expertise is in -- at least the firm we dealt with was lithium -- lithium battery fires, lithium battery failures, and they're probably the best in the world, in my opinion, at that point, and they were participating all the way.

So the equipment went through many tests, many trials, many examinations, microscopic analysis from the experts with Exponent, et. cetera, and all parties agreed to use Exponent because of their background and expertise, and when all was said and done, with so many meetings and presentations and things, when all was said and done, we had narrowed in on three potential root causes.

One of them -- one of those was only agreed to by one party, so it was a minority possibility, but none of those three causes, none of those three causes had anything to do with a prior incident that occurred on the battery.

One of the tests that was done was the logic circuitry. It still existed. I mean, there was a fire, but the logic circuitry still existed. We could see the circuit boards, and they x-rayed it. They x-rayed the boards and put it through the latest technology and they literally found out that the chips looked operational at the time.

Q So were you present in the courtroom when Mr. Leon was asking Dr. Cheng some questions concerning the exhibits related to possible damage to a battery?

A I was present in the courtroom.

Q I guess what I'm asking about is this possibility that the battery was damaged to the -- to the -- prior to the fire.

Was it the conclusion of the root cause analysis that this potential damage, whether or not it -- it had occurred -- did the -- did the root cause analysis draw a conclusion about whether or not the battery had been damaged prior to the fire?

The root cause analysis did not show -- the root cause analysis did show that the three potential outcomes had nothing to do with the battery event prior to the fire.

Q I'm going to show you what is Complainant's Exhibit Number 9.

JUDGE DORSEY: Excuse me. I don't think that answered the question. The question was did --

THE WITNESS: I'm sorry.

JUDGE DORSEY: The analysis show there had been damage, prior damage to the battery.

THE WITNESS: To the best of the analysis -- I need to -- there -- there -- the analysis showed that there could have been a potential of prior damage to the battery, totally unrelated to the spark gap or whatever had been discussed earlier.

One of the alternatives was there was a defect in a small corner of a cell. That was one of the alternatives. Totally unrelated to the discussions that happened here.

So I'm trying to explain it by saying the analysis showed that that -- the -- the occurrence Michael discussed with the SPU and the pitting on the connector, the pinning on the connector was not -- was shown not to be part of any of the three possible outcomes.

The three possible outcomes were linked to other root causes.

JUDGE DORSEY: All right.

BY MS. NEWMAN:

Q Just for clarification, is this --

And I think I'd also like to clarify that statement. There's probability in all of these analysis because the data isn't 100 percent perfect. There's always probability of, since we couldn't narrow it down lower than that, that's where it ended.

Q Okay. To be clear, Dr. Boost, I'm going to show you Complainant's Exhibit Number 4, which is -- we've looked at it a number of times with different witnesses, and this is e-mail communication between individuals at Securaplane and individuals from G.S. Yuasa --

A Mm-hmm.

Q -- who is the battery manufacturer, is that correct?

A Mm-hmm, yes.

Q And this incident that's discussed in these e-mails -- if you'd turn to what's Page 3 of Complainant's Exhibit Number 4 on the bottom here, where Curtis sends an e-mail to Sami --

A Yes.

Q -- and describes an incident in the lab --

A Mm-hmm.

Q -- while connecting the battery.

A Mm-hmm.

Q Did the root cause analysis show that this incident played any role in the fire of November 2006?

A The root cause analysis showed that that did not play a role.

Q Okay. Next, I'm going to show you Complainant's Exhibit Number 9.

A Okay.

Q And this is another exhibit that was looked at in the past, and I believe that it was discussed during Dr. Cheng's testimony.

If you'd look about a third of the way -- or three-quarters of the way down the page, there's a parenthetical here that says, "(Today, battery is critical, BCU is essential.)" Do you see that there?

A Yes, I do.

Q Is this e-mail stating that use of the battery is essential to performing the ATP on the BCU?

A No, not at all.

Q Is it saying that use of the battery is critical to performing the ATP on the BCU?

A No, that's not what it says.

Q What is this referring to?

1 A That's referring to a category of equipment. Most equipment that goes on airplanes is classified as
 2 either critical, essential, or non-essential. Certain tests apply if you're considered critical, certain tests
 3 apply if you're considered essential, and other tests apply if you're non-essential.

4 It's just a category given to equipment that basically specifies its testing regime and -- and related items.

5 Q Okay. You mentioned that there were some potential causes identified as a result of that analysis. Did
 6 any of them -- did any of those potential causes include any actions taken on the part of Mr. Leon?

7 A Yes.

8 Q Can you describe those, please?

9 A Again, this -- this is one of the three root causes. One of the potentials was that the battery was being
 10 used -- allow me to explain further.

11 This is not -- this is not a double A battery with just two terminals. This is a battery that's about 50 pounds.
 12 It's about two times the size of a car battery. It's -- it's considered the Ferrari of batteries. It's considered a
 13 Ferrari. It's lightweight, a lot of power.

14 Consequently, it doesn't just have two terminals. It has a signal connector that's basically made to
 15 connect with the BCU that has -- I can't count them exactly. Michael said about -- Mr. Leon said about 30.

16 There's roughly 20 to 30 interface signals that go between the two. Those signals include a number of --
 17 of -- of signals for inhibit, stop, and other articles that are required to monitor or control that -- the charger
 18 and the battery together. They operate almost together.

19 Michael appeared to be using the battery with the power connectors connected so the charger could
 20 charge the battery but the signal harness between the two were not -- was not connected. So he was --
 21 he was providing energy to the battery but we weren't -- we didn't have a good look or it was apparent he
 22 -- the charge -- he was controlling that outside of the scope of the connector that was necessary to control
 23 the charger and the battery.

24 So it's almost -- it's almost like an analogy would be a Ferrari had -- had delivered a car and you were
 25 racing it around the track, racing it around the track, but you didn't look -- you didn't look at your signal
 26 gauges, oil pressure or water pressure or -- or all those signals. You were basically relying on the thing to
 27 work as you can and the signal connector wasn't connected and that was one of the possible causes.

28 ⁸ Exhibit 2 Leon Transcript Vol. 5

Q Okay. Well, I'm surprised that they were -- are you surprised they were able to -- to guess about
 anything from the little bit that was burnt and left?

Q You said you sent it to three different companies or three different analyses?

A No. There were many people involved in the analysis.

A No. I believe the evidence showed that, not really the individuals.

Q Well, if there was just as high a probability as that Number 8 cell failing, then why can you be so sure it
 was the way that Tom Carlson had it set up for me?

A Mr. Leon, I'm just explaining the results of the analysis.

Q Okay.

MR. LEON: No further questions. I don't want --

JUDGE DORSEY: All right.

MR. LEON: -- to get in no arguments.

JUDGE DORSEY: All right. Doctor, thank you.

(Witness excused.)

JUDGE DORSEY: All right. Mr. Leon, anyone else?

MR. LEON: Dr. Boost was the last of mine. I didn't want to call anyone else.

JUDGE DORSEY: All right.

MS. NEWMAN: We have two additional witnesses, Your Honor.

JUDGE DORSEY: Okay.

MR. LEON: Were they on your original Pre-Trial Statement?

MS. NEWMAN: They're on the Pre-Trial Statement we filed pursuant to the Judge's Order.

MR. LEON: Do we have that one, Mary? Their original Pre-Trial, because I don't remember them being
 listed.

Judge Nathanael Cousins ordered materials produced in Ecuador matter as they were relevant.

The Holy Bible upon which law is based upon, Mosaic law is the origin of legal proceedings, testimony and evidence.⁹ For the wise and the foolish both die. The wise will not be remembered any longer than the fool. In the days to come, both will be forgotten. Ecclesiastes 2:16

MS. NEWMAN: About 10 days prior to the trial, you listed the witnesses that you listed on your list as may call witnesses. Both of these witnesses were on your list. You told us that you would call them on Tuesday and we didn't get to them. We're calling them now.

MR. LEON: I don't see them listed, Your Honor.

JUDGE DORSEY: I'm sorry.

MR. LEON: May I approach, as well, Your Honor? I don't see them listed any -- on your Witness List. They aren't listed.

MS. NEWMAN: This is --

MR. LEON: The March 16th one that you sent me.

MS. NEWMAN: We didn't start this trial, Mr. Leon. The Judge's order gave us 15 days before trial.

MR. LEON: But we were supposed to take up where the trial left off. We can't submit new Pre-Trial Statements before the trial. This trial should -- this is the document, according to your original July 20th Order, this is the original Pre-Trial Statement that we're held to. I mean, I couldn't modify mine either.

MS. NEWMAN: There's no prohibition against giving Pre-Trial Statements to the Judge in July and they were. Furthermore, the date this was produced means there's no prejudice. You had this over 10 days prior to this trial.

MR. LEON: We were going -- we were supposed to pick up where the trial left off and it's like we never walked away.

JUDGE DORSEY: Well, when you say they were -- they were listed on -- on Mr. --

MS. NEWMAN: Leon's original Pre-Trial Statement.

JUDGE DORSEY: All right. If you listed them on your original statement, they are entitled to rely on the fact that you were going to call them --

MR. LEON: Okay.

JUDGE DORSEY: -- so that they didn't have to separately call them. So they're not truly new.

MR. LEON: Well, then why should they do the same thing with Lorrie Guzman then? I mean, she was -- Lorrie was listed on mine. Lorrie Guzman was listed --

JUDGE DORSEY: Probably because they were more important witnesses.

MR. LEON: Okay.

JUDGE DORSEY: All right. Then, Ms. Newman, who next?

MS. NEWMAN: Your Honor, at this point, we're ready to call Karen Steele.

JUDGE DORSEY: Ms. Steele, would you have a seat up here, please? Have a seat. Would you raise your right hand?

⁹ Luke 16:19-31

New International Version (NIV)

The Rich Man and Lazarus

¹⁹ "There was a rich man who was dressed in purple and fine linen and lived in luxury every day. ²⁰ At his gate was laid a beggar named Lazarus, covered with sores ²¹ and longing to eat what fell from the rich man's table. Even the dogs came and licked his sores.

²² "The time came when the beggar died and the angels carried him to Abraham's side. The rich man also died and was buried. ²³ In Hades, where he was in torment, he looked up and saw Abraham far away, with Lazarus by his side. ²⁴ So he called to him, 'Father Abraham, have pity on me and send Lazarus to dip the tip of his finger in water and cool my tongue, because I am in agony in this fire.'

²⁵ “But Abraham replied, ‘Son, remember that in your lifetime you received your good things, while Lazarus received bad things, but now he is comforted here and you are in agony. ²⁶ And besides all this, between us and you a great chasm has been set in place, so that those who want to go from here to you cannot, nor can anyone cross over from there to us.’

²⁷ “He answered, ‘Then I beg you, father, send Lazarus to my family, ²⁸ for I have five brothers. Let him warn them, so that they will not also come to this place of torment.’

²⁹ “Abraham replied, ‘They have Moses and the Prophets; let them listen to them.’

³⁰ “‘No, father Abraham,’ he said, ‘but if someone from the dead goes to them, they will repent.’

³¹ “He said to him, ‘If they do not listen to Moses and the Prophets, they will not be convinced even if someone rises from the dead.’”

Salvation Holy Spirit Seals

Ephesians 1:7-12 God expressed His love to us by sending His Son » « Ephesians 1:15,16 Faith in Christ leads to Christian Brotherly Love

Ephesians 1:13,14 The Holy Spirit Seals Us till the Day of Redemption [Translate]

Jesus Christ is the only way one can be saved from their sins. Only by trusting in Him for forgiveness of one's sins can a person be saved. Paul explains exactly this in the first part of Ephesians 1:13.

Ephesians 1:13 “In whom ye also trusted, after that ye heard the word of truth, the gospel of your salvation:...”

The people from the church in Ephesus heard the “word of truth”. This word of truth is the gospel (or good news) of their ability to be saved from their sins. This good news was brought about by their trust in Jesus Christ. People today look for ways to be saved from their sins. Some people feel just being a good person will do this. Some people believe in acting on some form of penance will do this for them. Others feel they've done so many bad things that there is no way for someone to be freed from the sins of their past. In Ephesians 1:13, Paul says Jesus Christ is the one “in whom ye also trusted” and this trust led to the good news of their salvation. Jesus Christ is the only way to be freed from the burden of sin. There is no sin so great that trusting in Jesus Christ will not free you from it.

After trusting in Jesus Christ, Paul explains how something wonderful happens.

Ephesians 1:13 “...in whom also after that ye believed, ye were sealed with that holy Spirit of promise,”

After they trusted in Jesus Christ, God put a seal upon them. Think of a seal being like a bond which only the owner of the seal can remove. When a king places a seal on a document, no one can break that seal except for the king himself. Verse 13 says that after we believe, we are sealed with the Holy Spirit of promise.

We are given the Holy Spirit when we believe in Jesus' ability to forgive our sins. The Holy Spirit acts as our keeper and secures us as part of God's family. Look at verse 14.

Ephesians 1:14 “Which is the earnest of our inheritance until the redemption of the purchased possession, unto the praise of his glory.”

Paul describes the work and purpose of the Holy Spirit within this verse. We are given the Holy Spirit as “earnest of our inheritance.” Being part of God's family, we will be due an inheritance. We are given this being adopted into His family. As a payment made to hold and secure us, God “paid” the Holy Spirit. When someone wants to buy something, oftentimes they are required to pay a down payment. The down payment is meant to hold the property till the time comes for the remainder to be paid. When we become children of God, God secures US with a down payment, which is the Holy Spirit. The Holy Spirit is a seal upon us, a seal which cannot be broken by anyone else, including the devil. This seal remains intact, as Paul puts it, “until the redemption of the purchased possession.”

We become God's purchased possession when we trust in Christ. The Holy Spirit holds us till we get to heaven, when God will break the seal, till God redeems what He has purchased.

Since the Holy Spirit seals us till this day, we have to be mindful of things we do, things we say and how we live our life. The Holy Spirit is with us, and since He is part of the Godhead Trinity, cannot stand sin. Look at Ephesians 4:30.

1 John 7:45 The officers then came to the chief priests and Pharisees, who said to them, "Why did you not bring
 2 [Jesus]?" 46 The officers answered, "No one ever spoke like this man!" 47 The Pharisees answered them, "Have you
 3 also been deceived? 48 Have any of the authorities or the Pharisees believed in him? 49 But this crowd that does not
 4 know the law is accursed." 50 Nicodemus, who had gone to him before, and who was one of them, said to them, 51
 5 "Does our law judge a man without first giving him a hearing and learning what he does?"

6 Exponent, Inc. in Chevron Equador case was ordered to produce records. Exponent attempted to withhold
 7 evidence in this matter as it has done throughout Boeing matter.

8 FAA Proceedings

9 Dr. Jung-Hui Cheng Michael Leon's Engineering Supervisor testified in the FAA Boeing 2008-
 10 AIR-00012 DOL proceedings which is now before the Ninth Circuit Court of Appeals 13-71450
 11 Leon v. LABR. 2008-AIR-00012 DOL Testimony pg. 19 trial transcript Vol. 1 - Ph.d. Dr. Cheng
 12 examined. This witness was favorable to Michael. Testimony:

13 Q Yeah. Previous -- there's the title right there. 4

14 A This is the titled to people. 5

15 Q Okay. Titled to people, and could you read this e-6 mail out loud, please? 7 A "We had total
 16 accident in the lab. Did Mike tell 8 you about? The technicians in the lab had an accident while 9
 17 connecting up the battery and decided to try and repair the 10 battery before making me aware of
 18 what happened. I walked in 11 on the activity in the lab and made them stop so I could 12
 19 evaluate and decide what to do. I took pictures and provide 13 in a report for you to review, Mr.
 20 G.S. Team."

21 Likewise, Dr. Michael Boost evasive lying corporate witness head who would NOT produce
 22 Exponent Analysis for battery during or after FAA . 2008-AIR-00012 DOL trial yet relied on
 23 this evidence for testimony and his unethical lawyers. The ALJ violated ADA court prohibited
 24 acts and is the subject of investigation litigation. This law firm Ogletree Deakins was accused by
 25 Maricopa County and settled for fraudulently billing stealing taxpayer monies in Maricopa
 26 County. This defendant in Michael Leon case which was dismissed by judges and this defendant
 27 is the CTO in FAA AIR 21 case that lied about corporate representative employment status. This
 28 Ph.d. unfavorable to Michael and harassed during safety concerns, convalescence at home after
 injuries from injury in February heart foot January-February 2007 and from explosion in
 November 2006. Michael Leon was forced to work 18 straight days in severe heart distress.

During AIR 21 proceedings discovery Michael Leon, Native American and Hispanic man
 learned prior to the explosion documented by emails that the battery he was forced to use which
 caused the fire had been previously damaged, repaired without his knowledge. It is not clear
 what happened to this battery but Securaplane subcontractor Boeing personnel concealed, re-
 repaired. Perhaps sparked, faulty uncertain. GS Yuasa and several emails confirm damage re-

Ephesians 4:30 "And grieve not the holy Spirit of God, whereby ye are sealed unto the day of redemption."

Let us live our lives pleasing to God, and pleasing to the Holy Spirit.

1 repair. Paraphrasing but an email said something to the effect that because it is Securaplane they
 2 are trustworthy. Mike can locate emails and provide to you. Again, concealment lies to insure
 3 that the Dreamliner met debut July 8, 2007 on the part of Boeing Securaplane and others. Profit
 4 before safety. The morning of the Battery fire at Securaplane, Michael Leon reported to
 5 management that the Battery was still warm from the previous day's useage. Yet this was not
 6 reported or acted upon: "FAA and Boeing witnesses artfully dodged responding to why they
 7 didn't take the time to re-test these batteries against a standard the FAA asked to be developed
 8 after a fire broke out at SecuraPlane." They knew there was a thermal issue back in November of
 9 2006 and buried this issue to expedite the program. They failed to act upon the minimum FAA
 10 standard.

11 After I discovered a short circuit across the fault detection circuitry of the charger that
 12 communicates with the battery, I was instructed to continue to ship airworthy systems without
 13 resolving this issue first- hence I started my FAA Whistleblower complaint. This was due to
 14 Boeing's pressure to expedite the program schedule as priority.

15 There were ongoing thermal concerns, the battery was returned to me after an external thermal
 16 sensor had been installed at Securaplane, instead of shipping it back to the manufacturer. This
 17 verified unauthorized opening of the battery to due this. After opening any unit, the acceptance
 18 test procedure is voided, and re-running of the ATP is required. It also showed that there was a
 19 possible thermal problem that was left unresolved. I had complained to management early in the
 20 morning of the fire that the battery was still hot from the previous day's testing. This fact has
 21 been swept under the rug to expedite the program at the cost of safety.

22 Plaintiffs in the Boeing matters, Michael Leon and M. Helen Bernstein, two disabled pro se
 23 litigants, one terminally ill, have been sparring with white shoe defense counsel in cases for the
 24 past six years in an effort to protect the public and receive justice for Michael Leon and his son
 25 international defamation, invasion of privacy, false light. This includes hundreds of thousands of
 26 pages of legal argument, transcript of records, audio video records and attendance at
 27 proceedings. This entails six Big Law law firms and judges from multiple forums. This includes
 28 lawsuit against defense counsel abuses. This concerns multiple media journalists mainstream as
 well as independent documentary filmmakers from all over the World that Plaintiffs Leon and
 Bernstein are assisting this entire year and ongoing. Boeing was fined \$2.75 for faulty parts in
 connection with 777, 787 same Washington manufacturing facility.

[http://thebostonjournal.com/2013/07/26/faa-proposes-2-75-million-fine-on-boeing-for-tardy-](http://thebostonjournal.com/2013/07/26/faa-proposes-2-75-million-fine-on-boeing-for-tardy-fastener-fix/)
 fastener-fix/ Unfortunately deaths had to occur first and Plaintiffs warned during these many
 years of litigation due to safety battery and parts not matching schematics placed on aircraft.
 Journalists are the only ones exposed these issues. Defense counsel have succeeded in
 suppressing from public, court for years in these lawsuits endangering consumers in this
 contentious litigation.

24 **COUNT ONE DEFAMATION INVASION OF PRIVACY FALSE LIGHT** 25 **EMOTIONAL DISTRESS**

26 14. Plaintiff hereby incorporates the allegations contained in paragraphs 1 - 13 as though
 27 fully set forth herein.

28 15. Defendants, through the above-described scurrilous and outrageous conduct and false
 statements, intentionally and/or recklessly, inflicted emotional distress upon Plaintiff. Plaintiff is

entitled to recover damages for the emotional distress caused by Defendants in an amount to be proven at trial. Exponent libeled in report which refuses to produce. This behavior has continued for years and years escalating with international libel in an attempt to conceal, suppress faulty parts, lithium ion battery. Dreamliner problematic issues worldwide has been the focus of daily news coverage. Three Chinese children perished on July 6, 2013. The same Washington facility manufactures both 777 and 787. My son was slandered individuals close to me. Boeing financed defense of Securaplane in FAA whistleblower DOL action pending before the Ninth Circuit Court Case No. 13-71450. Harassment began when I brought forth safety concerns prior to lithium ion battery fire in November 7, 2006 and has continually escalated. I was nearly killed in this accident due to supervisors refusal to adhere to safety concerns. I have lost my health and my career and live a poverty stricken life. These defendants continually attempt to inflict more mental and physical anguish on me. **Issue:** if employee is hard of hearing, anxiety disorder has been reprimanded at a job, does this mean that they are not deemed credible whistleblowing? If the employee has had traffic infractions does this bar them from complaining to supervisors? Is this what Congress intended? No protection afforded? Judge Dorsey stated that Michael Leon engaged in protected activity. ALJ Dorsey allowed perjury by Defendant Boeing Securaplane witnesses, withholding of evidence, reliance of Michael Boost on expert report by Exponent Consultants which was never submitted or provided to DOL or Claimant Michael Leon. Oro Valley police retained in connection with DOL litigation against Plaintiff Claimant and his son firefighter Achilles Leon. Plaintiff Claimant did not learn about police retention post employment retaliation until discovery in C20091791 civil action in Pima County Superior Court. The latest continuation harassment post employment below.

16. On January 22 2013 next gov Fiona Greigg Exponent stated Plaintiff was a convicted felon perpetuating negativity in an attempt to further discredit Plaintiff concerning safety concerns. Boeing and Fiona Griegg (spokesperson for all of the defendant companies in articles) stated that I was fired for internet email violation when the decision of Judge Dorsey states otherwise. Exponent continually defaming with fraudulent report disseminating to third parties. Boeing Securaplane accused me of lying to FAA investigators. The Decision did not state I was a convicted felon and I am not. . http://cdn.nextgov.com/media/gbc/docs/pdfs_edit/012213bb1a.pdf
<http://www.nextgov.com/emerging-tech/2013/01/2006-battery-fire-destroyed-boeing-787-suppliers-facility/60809/> **Exhibit A, B Attached.**

17. On January 22, 2013 Boeing spokesman Marc Birtel said the 2006 fire resulted from “an improper test set up, not the design of the battery.”
http://cdn.nextgov.com/media/gbc/docs/pdfs_edit/012213bb1a.pdf <http://www.nextgov.com/emerging-tech/2013/01/2006-battery-fire-destroyed-boeing-787-suppliers-facility/60809/> **Exhibit A, B Attached.** The analysis claiming this improper test setup which is circulating disparaging me was produced by Exponent. I have a right to review and challenge this defamatory publication which is circulated internationally and nationally.

18. On January 14, 2014 battery issues grounding Dreamliner in Tokyo. This is an ongoing defamatory emotional distress issue which I have a right to bring before a jury to determine the merits. I am a pro se litigant and cannot articulate like that of an attorney but I deserve the right to adjudicate claim in court forum I select to eschew. Laws are created so that actions can be brought if violations occur. Justice delayed is justice denied. There is no double jeopardy because this matter has never been tried, verdicts received. Exhibits C-D reflect the current problems with the lithium ion battery which I have emphasized continually. The problem has not been corrected rather redesigned continually. The Exponent report claims that the lithium ion battery explosion was merely improper setup and not the battery itself problematic.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs demand judgment against defendants, and each of them, for the following relief:

- a. Produce report and all notes, memoranda in connection with November 7, 2006 Boeing supplier Securaplane premises Tucson Arizona and disclose who ordered report prepare for
- b. Grant a permanent injunction enjoining Defendants, their officers, successors, assigns, and all persons in active concert or participation with them, from engaging in retaliation against individuals in close association with an individual who engages in protected activity or against individuals who participate in an employment discrimination proceeding;
- c. Order Defendants to institute and carry out policies, practices and programs which prohibit retaliation and which eradicate the effects of their past and present unlawful employment practices;
- d. Order Defendants to make whole Michael Leon by providing appropriate back pay and front pay for actual damages with pre-judgment interest, in an amount to be determined at trial, and other affirmative relief if necessary to eradicate the effects of their unlawful employment practices, including but not limited to Michael Leon's pecuniary losses;
- e. Order Defendants to make whole Michael Leon by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices described above, including medical expenses, in amounts to be determined at trial;
- f. Order Defendants to make whole Michael Leon by providing compensation for past and future non-pecuniary losses resulting from the unlawful employment practices complained of above, including emotional pain, suffering, inconvenience, loss of enjoyment of life and humiliation, in amounts to be determined at trial;
- g. Order Defendants to pay Michael Leon his special damages in amounts to be determined at trial;
- h. Order Defendants to pay damages to Michael Leon for any and all injuries to his career, in amounts to be determined at trial;
- i. Award Michael Leon the costs of this action, previous actions and any such further relief as the Court may deem jut, proper and equitable; and
- j. Grant such further relief as the Court deems necessary and proper in the public interest.

RESERVATION OF RIGHTS

Pursuant to the rules of pleading and practice, Plaintiff reserves the right to assert additional violations of federal and state law.

JURY DEMAND

Plaintiff demand a trial by jury and all issues so triable. Pursuant to Fed. R. Civ. P. 38 (a), (b) & (c) Plaintiff hereby demand a trial by jury on all issues. RULE 38. RIGHT TO A JURY TRIAL; DEMAND states:

(a) Right Preserved. The right of trial by jury as declared by the Seventh Amendment to the Constitution—or as provided by a federal statute—is preserved to the parties inviolate

b) Demand. On any issue triable of right by a jury, a party may demand a jury trial by:

(1) serving the other parties with a written demand—which may be included in a pleading—no later than 14 days after the last pleading directed to the issue is served; and

(2) filing the demand in accordance with Rule 5(d).

(c) Specifying Issues. In its demand, a party may specify the issues that it wishes to have tried by a jury; otherwise, it is considered to have demanded a jury trial on all the issues so triable. If the party has demanded a jury trial on only some issues, any other party may—within 14 days after being served with the demand or within a shorter time ordered by the court—serve a demand for a jury trial on any other or all factual issues triable by jury.

LEAVE TO AMEND

Plaintiffs demand a trial by jury and all issues so triable and leave to amend complaint if necessary. Plaintiffs reserves the right to amend.¹⁰

JURY DEMAND

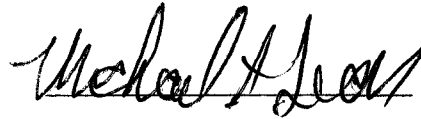
Plaintiff demands a trial by jury trial by the triers of fact not a judge and all issues so triable. Because of the oppressive, willful and malicious actions in the past and continually exhibited by

¹⁰ As a general matter, the sufficiency of a complaint filed in federal court is governed by Rule 8 of the Federal Rules of Civil Procedure. Rule 8(a)(2) provides that a complaint must set forth only "a short and plain statement of the claim showing that the pleader is entitled to relief." Given this "simplified standard for pleading, [a] court may dismiss a complaint only if it is clear that no relief could be granted under any set of facts that could be proved consistent with the allegations." *Swierkiewicz v. Sorema, N.A.*, 534 U.S. 506, 514, 122 S.Ct. 992, 152 L.Ed.2d 1 (2002) (quoting *Hishon v. King & Spalding*, 467 U.S. 69, 73, 104 S.Ct. 2229, 81 L.Ed.2d 59 (1984)). This court reviews de novo a district court's decision regarding a motion to dismiss, pursuant to FRCP 12(b)(6), because the district court decision is based purely on the legal sufficiency of a plaintiff's case. *Memphis, Tennessee Area Local, American Postal Workers Union, AFL-CIO v. City of Memphis*, 86 Fed. Appx. 137, Slip Copy, 2004 WL 103000 (6th Cir. 2004); *Barrett v. Harrington*, 130 F.3d 246, 251 (6th Cir. 1997). Under the liberal notice pleading rules, a complaint need only put a party on notice of the claim being asserted against it to satisfy the federal rule requirement of stating a claim upon which relief can be granted. *Fed.R.Civ.P. 8(a)*; *Swierkiewicz v. Sorema N.A.*, 534 U.S. 506, 508, 122 S.Ct. 992, 152 L.Ed.2d 1 (2002) (holding that a court may dismiss a complaint only if it is clear that no relief could be granted under any set of facts that could be proved consistent with the allegations). A complaint need not anticipate every defense and accordingly need not plead every response to a potential defense. *Poe v. Haydon*, 853 F.2d 418, 424 (6th Cir. 1988) (stating that a civil rights plaintiff need not anticipate an affirmative defense which must be pleaded by the defendant). A court must construe the complaint in the light most favorable to the plaintiffs and accept as true all well pleaded factual allegations. *Cooper v. Parrish*, 203 F.3d 937, 944 (6th Cir. 2000).

1 Defendants, Plaintiffs reserve the right to amend this First Amended Complaint to seek to
2 recover exemplary damages in addition to compensatory damages. Plaintiffs reserve the right to
3 amend this First Amended Complaint as discovery unfolds and litigation proceeds before a trial
4 before peers. The merits to be decided by the trier of fact.

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED this 15th day of January, 2014.



MICHAEL A. LEON
444 W. Orange Grove Road, #1136
Tucson, Arizona 85704
(520) 256-8457
Email: MichaelLion@yahoo.com
Plaintiff Pro Se

November 13, 2006
Securaplane Site Inspection
Sign in Sheet

	Name	Entity	Phone/Email
1.	Michael O'Connor	Securaplane Lawyer	602-262-5889
2.	Mike Bost	Securaplane	520-297-0844
3.	Brent Reichert	RKMC Lawyer	612-349-8588
4.	Jim Littenberger	FM Global	520-574-2546
5.	Craig Banta	FM Global	703-888-7326
6.	Sam Ghossein	Thales - Program	+331-368-87680
7.	Justin Hindman	Assoc. Fire Consultants	520-579-5548
8.	Steve Horbaruka	Golden Ranch Fire District	520-818-1817
9.	Colin Muckelbauer	Exponent	650-678-8678
10.	Tom Conklin	Unified	505-256-8669
11.	Bill Holt	Da Lishion Sys/GS Yuma	678-735-2140
12.	Toshio Ohara	GS Yuma International	+81-90-9140-4212
13.	Teyuo Semada	GS Yuma Corporation	+81-75-316-379
14.	Michael Polloff	Gilbane Cat Response	832-754-7415
15.	David Smith	Assoc. Fire Consultants	520-579-5548

November 13, 2006 11:00 A.M.
Securaplane site inspection
Sign in sheet

Name	Entity	Phone/Email
Michael O'Connor	Securaplane Lawyer	602-262-5889
Mike Bost	Securaplane	520-297-0844
Brent Reichert	RKMC Lawyer	612-349-8588
Jim Littenberger	FM Global	520-574-2546
Craig Banta	FM Global	703-888-7326
Sam Ghossein	Thales - Program	+331-368-87680
Justin Hindman	Assoc. Fire Consultants	520-579-5548
Steve Horbaruka	Golden Ranch Fire	520-818-1817
Colin Muckelbauer	Exponent	650-678-8678
Tom Conklin	Unified	505-256-8669
Bill Holt	Da Lishion Sys/GS Yuma	678-735-2140
Toshio Ohara	GS Yuma International	+81-90-9140-4212
Teyuo Semada	GS Yuma Corporation	+81-75-316-379
Michael Polloff	Gilbane Cat Response	832-754-7415

Associated Fire Consultants, Incorporated

4207 W. 1st Road, Suite 101
Tucson, Arizona 85710-2270
520-579-5548
Fax 520-579-5542
www.afcinc.com

JEFFREY B. CONEY, C.F.I.

Associated Fire Consultants, Incorporated

4207 W. 1st Road, Suite 101
Tucson, Arizona 85710-2270
520-579-5548
Fax 520-579-5542
www.afcinc.com

JUSTIN P. HINDMAN



**Golden Ranch
Fire District**

Steven Horbaruka
Inspector

200 E. 1st Road, Suite 101
Tucson, Arizona 85710-2270
520-579-5548
Fax 520-579-5542
www.afcinc.com

Colin J. Muckelbauer, P.E.

Exponent

10000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.exponent.com



Unified Engineering & Construction, Inc.

2000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.unifiedeng.com

Thomas J. Conklin
David Conklin

505-256-8669
505-256-8669



JENNINGS & ASSOCIATES

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

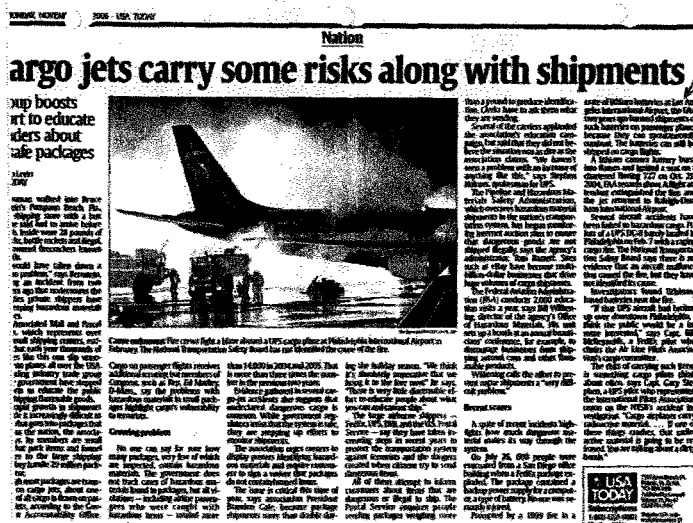
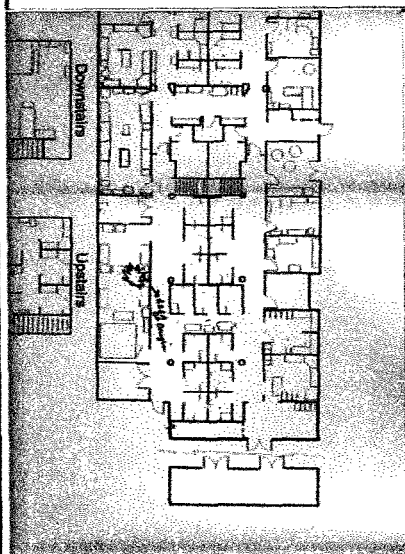
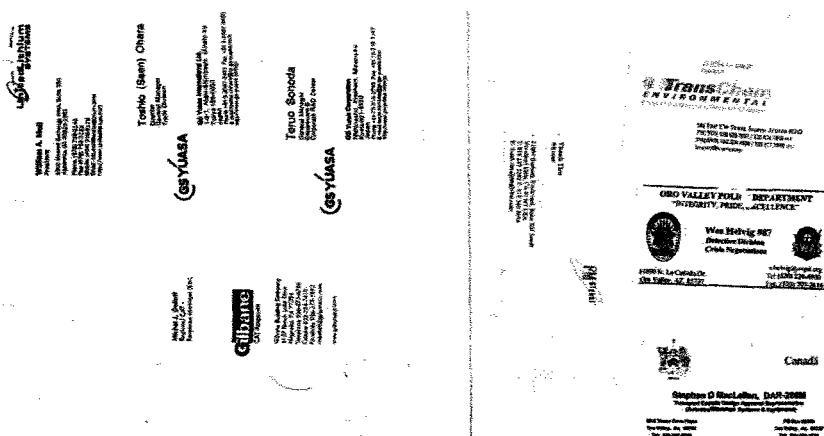
JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN

1000 North Central Expressway
Suite 100, San Jose, CA 95131
408-253-1400
Fax 408-253-1401
www.jenningsandassociates.com

JUSTIN P. HINDMAN



<http://www.latimes.com/business/money/la-fi-mo-boeing-787-dreamliner-battery-japan-airlines--20140114,0,3788916.story#axzz2qTtUlepj>

Japan Airlines grounds Boeing Dreamliner after battery issue ...

www.telegraph.co.uk › Finance › News by Sector › Transport

21 hours ago - Plane grounded after white smoke is seen coming from battery system is latest incident to plague

Boeing's Dreamliner.

News for japan dreamliner

1. Another battery incident troubles Boeing's 787 Dreamliner

CNN International - 8 hours ago

Reports surfaced Tuesday of battery smoke aboard a Japanese Boeing 787, nine months after it returned to flight.

2. Boeing probing Japan Airlines' battery issue on 787 Dreamliner

Los Angeles Times - by W.J. Hennigan - 17 hours ago

3. Japan Airlines Grounds Another Dreamliner After Battery Problems

TIME - by Eliana Dockterman - 12 hours ago

3. Battery Problem Reported On Boeing Dreamliner In Japan : The ...

www.npr.org/.../battery-problem-reported-on-boeing-dreamliner-in-japa...

12 hours ago - Reports of white smoke from a battery compartment have temporarily grounded a Boeing

787 Dreamliner in Japan, nearly a year after all the ...

4. Japan Air grounds Dreamliner after battery problem

www.smh.com.au/.../japan-air-grounds-dreamliner-after-battery-problem...

14 hours ago - Japan Airlines Co Ltd grounded one of its Boeing 787 Dreamliners at Tokyo's Narita International

Airport on Tuesday after white smoke was ...

5. Boeing 787 aircraft grounded after battery problem in Japan - BBC

www.bbc.co.uk/news/business-25737515

3 hours ago - Japan Airlines finds potential battery fault on a Boeing 787, a reminder of last year's grounding of the entire fleet of Dreamliner aircraft.

6. Boeing probing Japan Airlines' battery issue on 787 Dreamliner ...

www.latimes.com/.../la-fi-mo-boeing-787-dreamliner-battery-ja...

by W.J. Hennigan - in 317 Google+ circles

18 hours ago - Aerospace giant Boeing Co. is working to resolve another battery issue reported on one of its

787 Dreamliner jets when Japan Airlines ...

7. Smoking Boeing 787 Dreamliner battery raises alarms in Japan ...

1 www.theverge.com/.../smoking-boeing-787-dreamliner-battery-raises-ala...

2 20 hours ago - Boeing spent much of the first half of last year battling problems with its 787 Dreamliner airplane —
3 battery problems led to a number of fires, ...

8. Images for japan dreamliner

5 - Report images

9. Japan Airlines grounds Boeing Dreamliner with battery problem ...

9 www.dw.de/japan-airlines-grounds-boeing-dreamliner.../a-17361859

10 12 hours ago - **Japan Airlines** has said it temporarily grounded one of its Boeing 787s after observing gas or smoke
11 coming from a battery cell. Last year, all ...

10. Boeing 787 Dreamliner battery problems - Wikipedia, the free ...

13 en.wikipedia.org/wiki/Boeing_787_Dreamliner_battery_problems

16 The grounded **Japan Airlines** 787 at Boston Logan Airport. In the Boeing 787 Dreamliner's first year of service, at
17 least four aircraft suffered from electrical system ...

11. Boeing confirms new 787 Dreamliner battery incident - CBS News

18 www.cbsnews.com/.../japan-airlines-smoke-seen-coming-from-boeing-7...

20 19 hours ago - Boeing (BA) said the problem on a **Japan Airlines** 787 was discovered during scheduled maintenance.
21 No passengers were on board.

1. Another battery incident troubles Boeing's 787 Dreamliner - CNN.com

23 www.cnn.com/2014/01/14/travel/787-dreamliner/

25 10 hours ago - Reports surfaced Tuesday of battery smoke aboard a **Japanese** Boeing 787, nine months after it
26 returned to flight.

2. Dreamliner Grounded by Japan Airlines Due to Battery Problems ...

27 world.time.com/.../japan-airlines-grounds-another-dreamliner-af...

by Eliana Dockterman - in 74 Google+ circles

14 hours ago - **Japan Airlines** grounded one of its **Dreamliner** jets after "white smoke" began streaming from the battery system during a pre-departure ...

3. **Japan Airlines Dreamliner grounded due to battery problem - France ...**

www.france24.com/.../20140115-dreamliner-grounded-battery-problem...

9 hours ago - **Japan Airlines (JAL)** has grounded another of its **Dreamliner** jets after "white smoke" was reportedly seen outside the cockpit window during a ...

4. **JAL Dreamliner hit by another battery problem - Yahoo News**

news.yahoo.com/jal-dreamliner-hit-battery-problem-001418392.html

6 hours ago - From Yahoo News: **Japan Airlines** has grounded another one of its **Dreamliner** jets after "white smoke" was seen outside the cockpit window ...

5. **Smoking Boeing 787 Dreamliner caused by yet another battery ...**

www.dailymail.co.uk/.../Smoking-Boeing-787-Dreamliner-caused-batter...

12 hours ago - More problems: Staff inspect a grounded All Nippon Airways (ANA) Boeing 787 **Dreamliner** at Haneda airport in Tokyo, **Japan**, following an ...

6. **Japan airlines Dreamliner hit by battery problem - Australia Network ...**

www.abc.net.au/news/2014-01-15/an-japan...dreamliner.../5201360

13 hours ago - **Japan Airlines** has grounded one of its **Dreamliner** jets after a technical glitch in the battery system.

7. **Japan Airlines Boeing 787 grounded after battery leaks and lets off ...**

www.theguardian.com > [Business](#) > [Boeing](#)

13 hours ago - **Japan Airlines** temporarily grounded one of its Boeing 787 **Dreamliners** on Tuesday due after a battery started leaking and letting off smoke.

8. **Boeing 787 Dreamliner - The New York Times**

topics.nytimes.com > [Business](#) > [Companies](#) > [Boeing Company](#)

Commentary and archival information about the Boeing 787 **Dreamliner** from The New York ... **Japan Airlines Deal With Airbus Is Blow in Boeing Stronghold.**

9. **Japan Airlines benches 'Dreamliner' jet after finding 'white smoke ...**

1 www.rawstory.com/.../japan-airlines-benches-dreamliner-jet-after-findin...

2 14 hours ago - **Japan Airlines** has grounded one of its **Dreamliner** jets after it found "white smoke" apparently coming
3 from a battery system during a check-up ...

10. **Two 787s forced to turn around in latest Dreamliner troubles - NBC ...**

5 www.nbcnews.com/.../two-787s-forced-turn-around-latest-dreamliner-tr...

7 Oct 10, 2013 - Two Boeing 787 **Dreamliners** operated by **Japan Airlines** had to turn back mid-flight in the space of 24
8 hours because of technical problems...

10 [Previous](#)12345678910[Next](#)

1:1. **JAL probes another 787 battery incident | The Japan Times**

13 www.japantimes.co.jp/.../smoke-from-battery-causes-japan-air-to-ground...

14 3 hours ago - **Japan Airlines** is investigating what caused a battery on a Boeing ... JAL switched out
15 that **Dreamliner** with another 787 for the flight, he said.

1 2. **Japan Airlines B787 Dreamliner - SeatPlans.com**

17 www.seatplans.com › [Airlines](#) › [Japan Airlines](#) › [Seat plans](#)

19 **Japan Airlines** launched its first Boeing 787 **Dreamliner** on its new Tokyo-Boston route on April 22, 2012 with a layout
20 featuring 144 seats in economy and 42 in ...

2:3. **Boeing 787 Dreamliner Flight Tracker**

22 flighttracker.newairplane.com/

25 www.ethiopianairlines.com. **JAPAN AIRLINES JAL708**. (Enroute) BANGKOK TOKYO (NARITA). VIEW IN GOOGLE
26 EARTH BOOK FLIGHT FLIGHT DETAILS.

27 4. **Japan Airlines grounds Dreamliner after battery ... - Chicago Tribune**

2:0 www.chicagotribune.com › [Business](#) › [Chicago Breaking Business](#)

23 hours ago - **Japan Airlines** discovered smoke coming from the main battery of one of its Boeing 787 jets, two hours before the plane was due to fly to ...

5. **Japan Airlines Dreamliner hit by another battery problem | NDTV.com**

www.ndtv.com > World

8 hours ago - **Japan Airlines** has grounded another one of its **Dreamliner** jets after "white smoke" was seen outside the cockpit window during maintenance, ...

6. **Japan Airlines grounds Boeing Dreamliner**

rthk.hk/rthk/news/englishnews/.../news_20140115_56_977593.htm

12 hours ago - **Japan Airlines** on Wednesday grounded one of its 787 **Dreamliner** aircraft after smoke was detected coming from the plane's battery.

7. **Seattle=Tokyo route operate daily on the boeing 787 Dreamliner | ANA**

www.ana.co.jp/www/us/e/local/promotion/seattle_line/

Seattle=Tokyo route operate daily on the boeing 787 **Dreamliner**, ANA, All Nippon Airways North American region provides travelers to **Japan** and Asia with ...

8. **Radio New Zealand : News : World : Japan grounds Dreamliner fleet**

www.radionz.co.nz/news/world/233428/japan-grounds-dreamliner-fleet

11 hours ago - **Japan Airlines** has grounded one of its fleet of 787 **Dreamliner** aircraft after smoke was detected coming from the plane's battery. A **Dreamliner** ...

9. **Battery overheat grounded 787 Dreamliner program in Japan ...**

news.xinhuanet.com > Home > Video

7 hours ago - A Boeing 787 **Dreamliner** operated by **Japan Airlines** was grounded after discovering a battery problem during a check up at **Japan's** Narita ...

10. **More Battery Problems for Boeing's Dreamliner Jet**

www.voanews.com/content/more-battery...dreamliner.../1830372.html

10 hours ago - **Japan Airlines** reported that a mechanic saw white smoke rising from beneath the cockpit of a parked **Dreamliner** during routine maintenance at ...

1. Battery Malfunction Has Little Impact on Dreamliner's Operations ...

blogs.wsj.com/japanrealtime/.../airlines-shrug-off-dreamliner-battery-inci...

6 hours ago - Agence France-Presse/Getty Images: A Japan Airlines' Boeing 787 Dreamliner was on the tarmac at Narita international airport in Chiba ...

2. Japan Airlines Reports Another Dreamliner Battery Incident - Skift

skift.com/.../japan-airlines-reports-another-dreamliner-battery-incident/

23 hours ago - Japan Airlines said a maintenance crew at Narita Airport discovered smoke coming from the main battery of one of its Boeing 787 jets.

3. Japan Airlines reports Dreamliner battery problem -NHK WORLD ...

www3.nhk.or.jp/nhkworld/english/news/20140115_07.html

15 hours ago - Japan Airlines says a mechanic spotted white smoke coming from the lower section of a Dreamliner during a pre-departure check at Narita ...

4. Boeing's Dreamliner nightmare continues as Japan Airlines defects ...

qz.com/.../boeings-dreamliner-nightmare-continues-as-japan-airlines-def...

Oct 7, 2013 - In one of the corporate world's great rivalries, Airbus is gaining the upper hand over Boeing. The European aerospace group announced a ...

5. BREAKING: Boeing Stock Drops After Smoke Is Reported From ...

www.ibtimes.com/breaking-boeing-stock-drops-after-smoke-reported-ja...

23 hours ago - BREAKING: Boeing Stock Drops After Smoke Is Reported From Japan Airlines-operated 787 Dreamliner Battery. By Christopher Harress.

6. Business & technology | Building the Dreamliner | The Seattle Times

seattletimes.com/multimedia/news/business/...dreamliner/boeing-787.htm...

The Dreamliner is the first Boeing plane that relies on global partners to build most of... Japan. Show/hide all layers. are sent to Everett for final. Wichita, KS. Italy.

7. Japan Airlines found smoke coming from Boeing 787 Dreamliner ...

mynorthwest.com/.../Japan-Airlines-found-smoke-coming-from-Boeing-...

22 hours ago - **Japan** Airlines reports a new problem with a battery on board a Boeing 787. - Local at MyNorthwest.com.

8. **Dreamliner jet grounded in Japan over battery problems - Transport ...**

www.arabianbusiness.com/dreamliner-jet-grounded-in-japan-over-batter...

8 hours ago - **Japan** Airlines Co Ltd said it temporarily grounded one of its Boeing 787**Dreamliners** at Tokyo's Narita International Airport on Tuesday after ...

9. **Boeing hit by fresh 787 battery problem - FT.com**

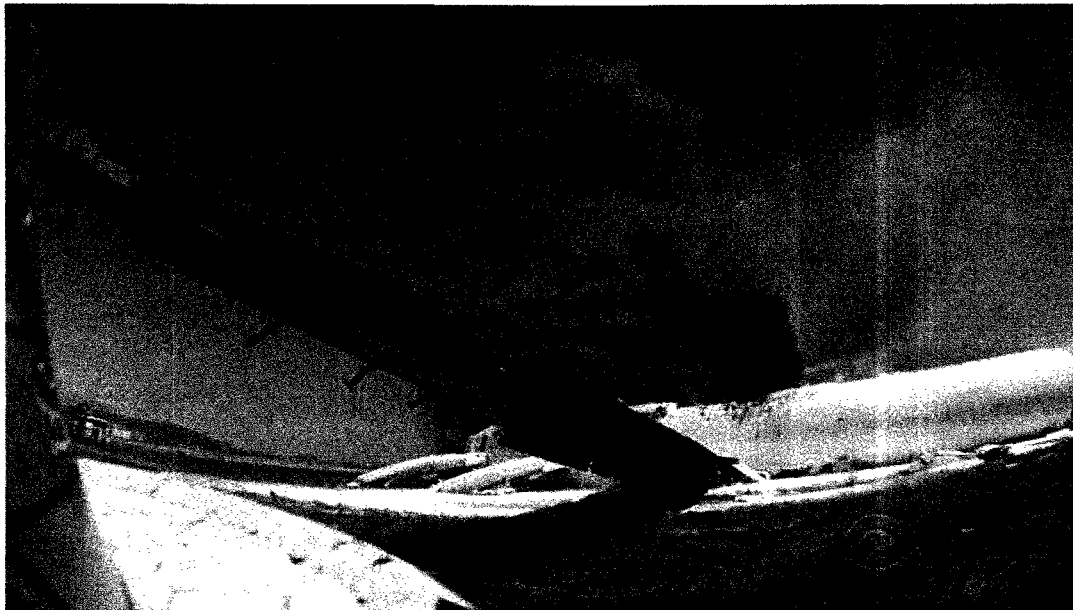
www.ft.com > Companies > Transport

21 hours ago - Boeing was hit by a fresh problem with the battery system on its 787**Dreamliner** passenger jet, after **Japan** Airlines' maintenance staff reported ...

10. **787 Dreamliner - The Japan Daily Press**

japandailypress.com/tag/787-dreamliner/

Boeing's troubled 787 **Dreamliner** just can't seem to get a break to go its way, as another new incident was recorded on a **Japan** Airlines 787 bound for Bangkok ...



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

www.nextgov.com/emerging-tech/2013/01/2006-battery-fire-destroyed-boeing-787-suppliers-facility/60809/

Nextgov



Transparency in Operation



Government Data Saves Lives



Google's Next and the Future



Facebook Goes to Russia

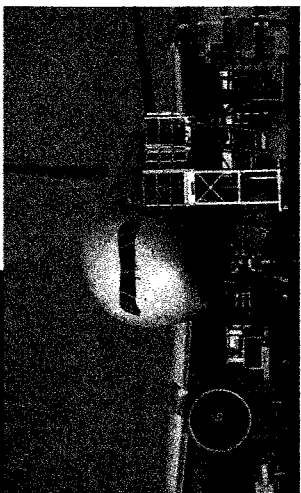
EMERGING TECH

GOVERNMENT DATA SAVES LIVES

GOOGLE'S NEXT AND THE FUTURE

FACEBOOK GOES TO RUSSIA

A 2006 BATTERY FIRE DESTROYED BOEING 787 SUPPLIER'S FACILITY



Elaine Thompson/AP

An explosion in a lithium battery under development for use in the Boeing 787 Dreamliner resulted in a fire that destroyed the Tucson, Ariz. facility of manufacturer Secureplane in 2006.

Following that incident, an employee filed a

By Bob Braylin
January 22, 2013
10 Comments

Print this article
Email this article
A.A. Adjust font size

NEXIGOV NEWSLETTER
SUBSCRIBE

RELATED STORIES

Battery Maker's Fall Fuels Criticism of Federal Energy Investments

PROMOTIONS

RESOURCES Mobile Apps / Read More

RESEARCH The Cloud Roadmap for Agencies: How to move fast (and safely) to capture huge savings // Download Now

SPOT ON: SECURITY Need to Know Memo: How agencies can spot threats and trends amidst reams of data // Read More

RESEARCH Acquisition Insights: Generating Savings through Strategic, Creative Practices // Download Now

FREE NEWSLETTERS

- ☐ Nextgov Today
- ☐ Health IT
- ☐ Nextgov ThreatWatch
- ☐ Nextgov Cloud
- ☐ Nextgov Mobility

SEE ALL >

10
Z
1
Comments

whistleblower lawsuit with the Labor Department alleging the company had produced an unsafe battery. Labor dismissed the suit on procedural grounds.

Internal documents from the Pipeline and Hazardous Materials Administration show that Securaplane tested a battery from one manufacturer for use in the 787 but substituted another for use in production systems based on assertions that the new batteries were identical to those tested.

Securaplane manufactures the lithium ion auxiliary power unit and a battery charger unit for the 787. The Federal Aviation Administration grounded Boeing's entire fleet of 787s after battery fires earlier this month.

Securaplane, a unit of global engineering firm Meggit PLC, based in the United Kingdom, manufactures the systems for Boeing under a subcontract with Thales, headquartered in a Paris suburb. Thales has a contract for the 787's electrical power conversion system, with GS Yuasa of Kyoto supplying the batteries.

Michael Leon, a Securaplane engineering technician, was working on the 787 battery charger unit when it exploded in 2006. He complained in January 2007 that the units did not conform to design schematics, according to a final decision and order Labor issued July 15, 2011.

According to that 58-page document, Securaplane won a contract for the 787 battery charger unit in 2004. In November 2006, while Leon was running tests, the battery exploded, resulting in "a devastating fire that destroyed [Securaplane's] labs and production building."

Despite his concerns, Leon said he was "pressured [by Securaplane] to sign off on Acceptance Test Procedures (ATPs) for noncompliant units and ship them to customers. He says he gave in to pressure to run the ATPs, knowing they would be re-run after he fixed the units, but balked at actually shipping noncompliant units," according to the document.

On March 1, 2007, Leon left work without shipping what he thought were noncompliant battery charger units. When he returned to work on March 5, 2007, he received a formal written disciplinary warning. Leon says he continued to raise the nonconformance issues and the discrepancy, but no one fixed it. Eventually he filed an FAA complaint.

Meanwhile, Leon charged, he was subject to disciplinary action, was later suspended, and eventually fired. "Leon believes the timing of his termination proves Securaplane was motivated by retaliatory animus toward Leon's protected safety activities," the Labor Department decision said.

Securaplane, along with Thales and GS Yuasa, conducted a two-year investigation and narrowed the cause of the fire to one of three possibilities: a defect in one corner of a battery cell, prior damage to the battery, and Leon's failure to connect a harness that transmits signals between the battery and the charger unit during the test.

Boeing spokesman Marc Birtel said the 2006 fire resulted from "an improper test set up, not the design of the battery." FAA spokeswoman Laura Brown said the agency "investigated Mr. Leon's complaints in 2008 and 2009. The investigation determined that the battery charging units in the complaints were prototypes, and none are installed in Boeing 787 aircraft. Our reviews also determined Securaplane's production of a particular printed circuit board complied with FAA requirements."

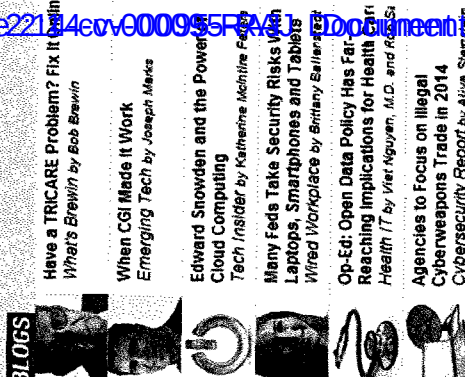
FAA Did Not Require Boeing to Use Strict Test Standards on 787 Batteries

NTSB's cursory exam of the Boeing 787's main battery shows no problems

Lithium ion battery short circuited in first 787 Dreamliner fire

Enter your email address here.

SUBSCRIBE



BLOGS
Have a TRICARE Problem? Fix It
What's Brewin' by Bob Brewin

When CGI Made It Work
Emerging Tech by Joseph Marks

Edward Snowden and the Power
Cloud Computing

Tech Insider by Katherine McIntire Feltz

Many Feds Take Security Risks With
Laptops, Smartphones and Tablets

Wired Workplace by Brittany Sallender

Op-Ed: Open Data Policy Has Far-
Reaching Implications for Health

Health IT by Viet Nguyen, M.D. and Rishi

Agencies to Focus on Illegal
Cyberweapons Trade in 2014

Cybersecurity Report by Aliya Stenberg

SPONSORED LINKS

Download the infographic to see what challenges agencies face and how to overcome

Do you understand how it all works, why it all matters and what we can do?

Federal leaders discuss how social media is used to better understand public needs

EXHIBIT B

EXHIBIT C

news.yahoo.com/jal-dreamliner-hit-battery-problem-1014183923.html

Home Mail News Sports Finance Weather Games Groups Answers Screen Film Music More »

YAHOO!
NEWS


Search News Search Web

News Home
U.S.
World
Politics
Tech
Science
Health
Odd News
Opinion
Local
Dear Abby
Comics
ABC News
Yahoo! Originals
Photos

Related
Robert Gates interview

JAL Dreamliner hit by another battery problem

By Mike Suzuki
13 hours ago



Tokyo (AFP) - Japan Airlines has grounded another one of its Dreamliner jets after "white smoke" was seen outside the cockpit window during maintenance, a year after the aircraft suffered a months-long global grounding over battery problems.

Top Stories

Latest Video:

news.yahoo.com/jal-dreamliner-hr-battery-problem-001418392.html

Home Mail News Sports Finance Weather Careers Groups Answers Screen Flickr Music News

YAHOO!
NEWS

Search News

Search Web

News Home

U.S.

World

Politics

Tech

Science

Health

Odd News

Opinion

Local

Dear Abby

Comics

ABC News

Yahoo Originals

Photos

Featured

Robert Gates interview

The carrier said that a technician at Tokyo's Narita airport, who was working on the parked plane before its departure to Bangkok Tuesday afternoon, first noticed what appeared to be smoke outside the cockpit window and then a battery system warning.

An investigation found that one of the eight lithium-ion cells in the plane's battery system had leaked, but its safety valve, which is designed to release excessive pressure, was properly open.

"The temperature of the cell was high. We believe it caused 'white smoke', which could be smoke or vapour," a JAL spokesman said.

The airline said it replaced the grounded plane with another Dreamliner, which left as scheduled, carrying 169 passengers and crew.

"We are making sure of the safety of every plane before its departure. We will continue regular flights (with Dreamliners)," said a separate JAL spokesman, Norihisa Hanyu.

In response to the incident on Tuesday, US-based Boeing said the "improvements made to the 787 battery system last year appear to have worked as designed".

Boeing admitted in April that despite months of testing it did not know the root cause of the battery problems, but rolled out modifications it said would ensure the issue did not recur.

The measures comprised redesigning the battery and charger system and adding a steel box to prevent burning.

Since then, Dreamliners have experienced a series of minor glitches, including a fault with an air pressure sensor and the brake system.

Related Stories

[55] Japan Airlines Reports Malfunction in Boeing 787 Battery - The Wall Street Journal

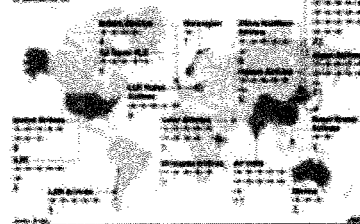
Japan Air grounds Boeing 787 after battery problem - Reuters

Airlines Strug Off Dreamliner Battery Malfunction - The Wall Street Journal

Latest Slide

Global Dreamliner Fleet

US Boeing 787 fleet now stands at 12 aircraft in 10



Fast fact: the 787 Dreamliner Boeing 787 Dreamliners that have been affected to airlines worldwide: 1457

[News Home](#)[U.S.](#)[World](#)[Politics](#)[Tech](#)[Science](#)[Health](#)[Odd News](#)[Opinion](#)[Local](#)[Dear Abby](#)[Comics](#)[ABC News](#)[Yahoo Originals](#)[Photos](#)[Featured](#)[Robert Gates Interview](#)

In October, unflushable toilets caused JAL pilots to turn their plane around just after it left Moscow bound for Tokyo.

JAL's domestic rival All Nippon Airways (ANA) also said Wednesday it would continue flying the plane — the pair are the aircraft's two biggest customers and have invested heavily in its success.

The incident was the latest for the Dreamliner since the trouble-plagued aircraft returned to service in the middle of last year following a months-long worldwide grounding.

The move was linked to a string of incidents, including a fire aboard a parked Dreamliner, which damaged the fuel-efficient jet's reputation and that of its manufacturer Boeing.

Investors appeared unfazed with JAL's Tokyo-listed shares closing up 1.33 percent at 5,300 yen, while ANA was up 0.89 percent to 225 yen, tracking a rise in the broader market.

Shares in the plane's Japanese battery supplier GS Yuasa slipped 0.68 percent to 582 yen.

The Kyoto-based battery maker said it was "cooperating with Boeing and Japan Airlines on finding the cause" of the latest battery malfunction. It declined to elaborate further.

Hideo Inagaki, a former JAL maintenance specialist and chief researcher at Japan Aviation Management Research, said the carbon-fibre bodied plane's glitches are little surprise given its state-of-the-art technology.

"Planes are very complicated machines and whether reported or not, they often experience glitches," he told AFP.

"The point is whether (Boeing) is appropriately handling these new issues."

The US Federal Aviation Administration said it was working with Boeing and the Japan Civil Aviation Bureau to investigate, while the US National Transportation Safety Board said it was ready to assist Japanese authorities.

Repeated efforts to get a comment from the Japanese aviation bureau's safety unit were unsuccessful.

The number of 787s in operation worldwide had more than doubled from the 50 in service when the plane was grounded last year.



A member of an NTSB investigation team examines pieces of damaged aircraft debris from a Boeing 787.

Yahoo News

[Aerial views of](#)
[Being a woman](#)
[Behind the sex](#)
[Francisco](#)
[London in 192](#)
[comparison of](#)
[Dog missing in](#)
[thanks to fliers](#)
[138th Annual](#)
[Show \(gallery\)](#)
["Letroning" Be](#)
[Now Faking Fc](#)
[Is it 2016 when](#)
[Apple Remove](#)
[Over Sexism](#)
[Twitter: Seattle](#)

EXHIBIT D

www.marketwatch.com/story/lithium-ion-batteries-cutting-edge-and-still-evolving-2014-01-15?siteid=yhoof2

Market Watch

16,995.08 3.5% 4,211.01 0.4% 1,842.81 0.1%

Jan 15, 2014, 3:13 p.m. EST

Lithium-ion batteries: cutting edge and still evolving

By Claudia Assis, MarketWatch | 326 followers

SAN FRANCISCO (MarketWatch) — Recent battery problems on board one of Japan Airlines' Boeing 787 Dreamliners and Tesla Motors' issues with a power adapter have rekindled concerns about the evolving technology that has made the aircraft, the electric car, and a lot of other products possible: lithium-ion batteries.

There are many variants designed for a wide number of applications. But one thing lithium-ion batteries have in common: They are not cheap.

In electric cars, the cost of a lithium-ion battery pack capable of storing enough energy to provide a range of a few hundred miles is still too high for most consumers. But for the time being, we seem to be stuck with them.

The battery of the future will likely still contain lithium, a lightweight element that can be paired with other materials. In any case, a breakthrough is years down the road and a good decade from commercial manufacture.

And then there's public perception: Consider a run-of-the-mill, conventional Honda Civic, one of the most popular cars of all time.

Related Now:

- Stocks cost too much
- The \$14 million dinner

Indicators: Stock futures hold losses after

Most Popular:

- 10 THINGS
10 things not to buy in 2014
- TAX GUY
Congrats, you owe the Alternative Minimum Tax
- Best Buy shares dive on holiday-sales drop
- MARK HULBERT
The top 5 Fidelity sector strategies of 2013
- INDICATORS
Stock futures hold losses after

Stories You Might Like:

- The top 5 Fidelity sector strategies of 2013
- SolarCity soars 7% on Deutsche Bank buy rating
- Yahoo COO exit may be bad sign for Q4

Most Popular:

10 THINGS
10 things not to buy in 2014

TAX GUY
Congrats, you owe the Alternative Minimum Tax

Best Buy shares dive on holiday-sales drop

MARK HULBERT
The top 5 Fidelity sector strategies of 2013

INDICATORS
Stock futures hold losses after

Home News Viewers Markets Investing Trading Deck Personal Finance Retirement Economy/Politics

Aerospace Airlines Banks Biotech Cars Computers & Electronics Energy Food & Beverage Internet Media Metals Pharma Retail Software Telecom

Log In Portfolio Alerts Games

Enter Symbols or Keywords SEARCH

www.marketwatch.com/story/lithium-ion-batteries-cutting-edge-and-still-evolving-2014-01-15?siteid=yhoof2

Home News Viewers Markets Investing Trading Desk Personal Finance Retirement Economy Politics Industries Equities

4 Comments Watchlist Relevance LEARN MORE

INDICATORS
Stock futures hold losses after claims, inflation data

Drivers may find it unsettling to know a fully-fueled Civic's gas tank holds the explosive equivalent of 1,000 sticks of dynamite. Yet, while car fires are not uncommon, they fail to attract much attention beyond roadside rubbernecking.

That's simply not the case with Boeing's [787-9](#). Dreamliner batteries or with high-end electric cars. Lithium-ion batteries store less energy than a car's gas tank, but any time there's energy stored there's a potential for fires -- and bad PR for both Boeing and Tesla. [TESLA +3.25%](#)

Tesla is managing its battery problem well, and Tuesday's National Highway Traffic Safety Administration recall would be more aptly called a software upgrade, said Fred Schlachter, a fellow and consultant at the American Physical Society and a retired physicist with the Lawrence Berkeley National Laboratory.

For Boeing, it will likely take a long time for its engineers to figure out exactly what went on at Tokyo's Narita airport. Japan Airlines reported seeing smoke from the aircraft on Tuesday and an investigation by U.S. and Japanese authorities is ongoing.

Boeing redesigned the Dreamliner's battery pack about a year ago after an incident at the Boston airport -- but "it treated the symptoms, not the causes of the problem," Schlachter said. It is still not fully known what caused the first incidents and it will likely take a long time to figure out the reasons for Tuesday's incident, he added.

"We have not tamed the internal combustion engine, we have accustomed the customers" that fires are relatively normal, Schlachter said. For electric cars and other products that use the lithium-ion batteries, there's not much history and perspective to go by.

"We accept the incidents," he said. "The reassuring part is there's much less energy in a battery than in a car's tank."

The primary goal is still a battery that can store more energy, thus offering a larger range, doesn't cost more, and it is not impractical in terms of size, Schlachter said.

Meanwhile, a lot of research is being carried out to find ways to reduce lithium-ion batteries' combustibility without reducing their performance, but a breakthrough in research of new materials is at least five years away and about a decade from widespread commercialization, said Dan Abraham, a scientist with the Argonne National Laboratory outside Chicago.

Breaking Insight



ROBERT POWELL
How to cut health-care costs in retirement



THE TECHNICAL INDICATOR
Charting a major trend reversal? No



CHUCK JAFFE
Why Vanguard is a role model for the fund industry









CHUCK JAFFE
Ignore the market's 2013 results and diversity

Content From Sponsors

www.marketwatch.com/story/lithium-ion-batteries-cutting-edge-and-still-evolving-2014-01-15?siteid=yhoof2

Home News Viewer Markets Investing Trading Desk Personal Finance Retirement Economy/Politics Industries Log In

4 Comments       Watchlist Relevance LEARN MORE

"It is really hard to nail down a winner at this time," he said. It could involve the use of different electrolytes in the battery pack, or adding certain additives to the electrolytes, or both, to prevent fires. Materials tried, however, are still pricey and performance is not great, he added.

More from MarketWatch:

[Boeing, Tesla: How attitude shapes attitude](#)

[Boeing shares drop on reported 787 battery problem](#)

[Google wants to run your home before Apple does](#)

Claudia Assis is a San Francisco-based reporter for MarketWatch. Follow her on Twitter @ClaudiaAssisMW.

EXHIBIT E

www.linkedin.com/pub/marc-birtel/2/369/353

LinkedIn

Marc Birtel

Greater Seattle Area · Airlines/Aviation

Join LinkedIn and access Marc Birtel's full profile. It's free!

As a LinkedIn member, you'll join 250 million other professionals who are sharing connections, ideas, and opportunities.

- See who you and Marc Birtel know in common
- Get introduced to Marc Birtel
- Contact Marc Birtel directly

View Marc's full profile

Marc Birtel's Overview

Current **Director, Media Relations at Boeing Commercial Airplanes**Education **Northwestern University**
Pomona CollegeConnections **500+ connections**

Marc Birtel's Experience

Director, Media Relations**Boeing Commercial Airplanes**

January 2011 – Present (3 years 1 month)

Marc Birtel's Skills & Expertise

Internal Communications Media Relations Program Management
 Strategic Communications Corporate Communications Crisis Communications
 Brand Management Communication Training Spokesperson
 Marketing Strategy Cross-functional Team Leadership Press Releases
 Public Relations Editing Social Media Newsletters Aircraft
 Communications Planning Aviation Speech Writing

View All (26) Skills

Marc Birtel's Education

EXHIBIT F

1. **Fiona Grieg's all-too-human flaws - All Opinions Are Local - The ...**
www.washingtonpost.com/.../fiona-griegs.../glQAF4Un8M_blog.html
 -
 - Nov 10, 2011 - Reacting to **Fiona Grieg's** dropping out of the Ward 2 D.C. Council race yesterday, many people said things like, "Politics isn't for faint of heart," ...
2. **Fiona Greig - Greater Greater Washington**
greatergreaterwashington.org/tag/Fiona+Greig/
 -
 -
 -
 - Nov 9, 2011 - Reacting to **Fiona Grieg's** dropping out of the Ward 2 DC Council race this morning, many of you said things like, "Politics isn't for faint of heart," ...
3. **Why good people like Fiona Greig don't run for Council - Greater ...**
greatergreaterwashington.org/post/12701/
 -
 -
 -
 - Nov 9, 2011 - Ward 2 insurgent DC Council candidate **Fiona Greig** announced this morning that she's dropping out of the race against 20-year incumbent ...
4. **Images for fiona grieg**
 - Report images
 -
 -
 -
 -
 -
 -
 -
5. **Fiona Greig Runs for Ward 2 Council seat - Loose Lips**
www.washingtoncitypaper.com/blogs/looselips/.../its-a-race-in-ward-2/
 -
 -
 -
 - Sep 19, 2011 - Long time Ward 2 Councilmember Jack Evans will face at least one competitor in next year's election. **Fiona Greig**, a new mom and a ...
6. **Fiona Greig Won't Run for D.C. Council Against Jack Evans in Ward ...**
www.washingtoncitypaper.com/.../ward-2s-greig-drops-out-takes-whack...
 -
 -
 - Nov 9, 2011 - Ward 2 D.C. Council candidate **Fiona Greig** has dropped her bid to unseat incumbent Jack Evans, citing a desire to avoid an "intimidation ...
7. **Twitter / ggwash: Fiona Grieg, @VoteFiona, ...**
<https://twitter.com/ggwash/status/116131512566562817>
 -
 -
 - **Fiona Grieg, @VoteFiona**, considering running against @JackEvans_Ward2:
<http://bit.ly/pbymtK> on <http://ggwash.org/12114>. Reply; Retweet Retweeted; Delete ...
8. **Fiona Grieg's all-too-human flaws | Regator - Curated Blog Search ...**

regator.com/p/253828357/fiona_griegs_all-too-human_flaws/

○
○

Reacting to **Fiona Greig's** dropping out of the Ward 2 D.C. Council race yesterday, many people said things like, "Politics isn't for faint of heart," or "If you can't ...

9. **Fiona Greig | LinkedIn**

www.linkedin.com/pub/fiona-greig/1/aab/9aa

○
○
○

View **Fiona Greig's** professional profile on LinkedIn. LinkedIn is the world's largest business network, helping professionals like **Fiona Greig** discover inside ...

← www.thegeorgetowndish.com/thedish/fiona-greig-run-against-jack-evans

THE GEORGETOWN **DISH** Jan. 16, 2014 WHAT'S HOT: Gray's Re-Election Campaign Heats U

HOME ABOUT US CONTACT US ADVERTISE

 **Fiona Greig to run against Jack Evans**
October 11, 2011 | by Watched Pot

Share This

Tags: Dupont Circle Citizens Association Rob Halligan

5

Tweet

1

Share



Photo by The Georgetown Dish



IMG_2335.JPG Potential candidate Fiona Greig (center) with Rob Halligan and an aide Stephanie Wade in Dupont Circle

Georgetown resident and potential D.C. Council candidate **Fiona Greig** met with a small group of Dupont Circle residents Monday night who urged her to take on 20-year incumbent Jack Evans to represent Ward 2

← C www.thegeorgetowndish.com/the-dish/fiona-greig-run-against-jack-evans

Small group of Dupont Circle residents Monday night who urged her to take on 20-year incumbent Jack Evans to represent Ward 2.



(Photo by: The Georgetown Dish)

Potential Ward 2 D.C. Council candidate Fiona Greig

vision for a secure community."

Greig, married with a two-month old baby, said she feels "compelled to serve...for my daughter where she can get a good education and enjoy living in the city."

Greig favors the recent tax increase from 8.5 to 8.95 percent for the District's highest-income residents. "I'm in favor of the tax increase [that just passed] while entering into conversation on how to increase efficiency of government."

Greig said she would use her experience in federal and local budgets to "reduce and prevent deficits." Budgets shouldn't be a matter of "adding and subtracting, i.e., adding taxes or cutting services for the poor" she said. "You can find

Arriving at the event on her bike, the 32-year-old McKinsey & Co. consultant told the group, "I believe we deserve better government, more efficient government, more ethical government and a full-time Councilmember [in a Council where there is] less profanity, that is open and accessible."

Greig, a Harvard PhD, moved to Washington from Cambridge, MA in 2007 and lives on 27th street. "I'm not a Washingtonian," she said. "I'm fresh and don't come with the baggage, special interest favors and promises I've made to people."

Greig, who has been meeting with a group of supporters for some months and said she is still exploring a candidacy, said D.C. residents deserve a clearer, forward-thinking vision for the city. "I am representative of many people who come to D.C. and Ward 2 who want to stay here," she said. The community bank and microloan expert said residents need a "leader in the community to inform families of their choices." Greig said the ward needs "a 20-year



MORE FROM WATCHED POT

- American Holiday Makes Every Day a Holiday
- Architects for Animals 'Giving Shelter' December 5
- ENO Wine Bar Opening Soon
- Capitol Hill: 220 Years in 3:13 Minutes
- Georgetown Block Watch for Public Safety

← C www.thegeorgetowndish.com/the-dish/fiona-greig-run-against-jack-evans

efficiencies... it's not too much to ask as a full-time Councilmember."

Asked whether she would support the D.C.-subsidized new convention center and Adams Morgan luxury hotels as well as a new soccer stadium in Anacostia, Greig said economic development "is not simply through real estate, real estate....I don't see why these projects couldn't be 100% private funding."

Greig said she recently met with Evans at Marvelous Market. "He gave a stump speech...a lot about past 20, 15, 10 years, not about the future."

More about Greig's exploratory campaign is on Facebook.

(Photo by: The Georgetown Dish)

Greig (left) with Pat Wilson, the host of the Monday meet & greet



EXHIBIT G

www.reuters.com/article/2013/01/21/us-boeing-securaplane-idUSPR3004320130121

REUTERS

HOME BUSINESS MARKETS WORLD POLITICS TECH OTHERS HEARING/NEWS MORE

787 probe puts spotlight on Arizona battery firm

BY ANDREA SHAAL-ESA

WASHINGTON Sun Jan 20, 2013 7:03pm EST

4 COMMENTS

Share this

RELATED NEWS

Dreamliner probe widens after excess battery voltage ruled out

Maker of 787 battery charger says will support U.S. investigation

Investigators to travel to port facility in Phoenix

Boeing probe focuses on battery, 787 deliveries halted

US safety official says unclear when 787 will fly again

RELATED TOPICS

U.S. »

Aerospace & Defense »

(Reuters) - Tucson, Arizona-based Securaplane Technologies Inc, which makes a charger for batteries used on the Boeing Co's 787 Dreamliner, on Sunday said it would support an investigation into battery issues that have grounded the new planes.

Securaplane, a unit of Britain's Meggitt Plc, first began working on the charger in 2004, but suffered millions of dollars of damages in November 2006 after a lithium-ion battery used in testing exploded and sparked a fire that burned an administrative building to the ground.

The U.S. National Transportation Safety Board on Sunday ruled out excess voltage as the cause of a battery fire on the 787 at the Boston airport this month.

It said investigators would travel on Tuesday to Tucson, Arizona, where Securaplane is based, to test and examine the charger and download memory from the controller for the auxiliary power unit. They also plan to travel to Phoenix and carry out similar tests at the site where a unit of United Technologies Corp builds the power unit.

← → C www.reuters.com/article/2013/01/21/us-boeing-securaplane-idUSBR90J08320130121

Fiona Greig, a spokeswoman for Securaplane, said the company had been invited to "contribute to the investigation process" and planned to fully support it.

"In line with the NTSB's practices, however, it would not be helpful to that investigation to comment further," she said in a statement provided to Reuters.

The U.S. Federal Aviation Administration (FAA) on Sunday said it had investigated safety complaints leveled by a former Securaplane employee in 2008 and 2009 but determined that the allegations focused on prototypes that were not ultimately used in the new lightweight airliner.

Shubhayu Chakraborty, president of Securaplane, earlier told Reuters that his company's lithium-ion battery charger was currently only in use on the Boeing 787, although it is developing different systems for use on other aircraft.

Securaplane is building a lithium-ion battery system for the KC-390 military transport plane being developed by Brazil's Embraer SA, which is due to have its first flight in 2014. Embraer declined comment.

The company is also developing backup batteries for the Embraer Legacy 450 and 500 business jets and will make the lithium battery for the next-generation Eurocopter EC-135 helicopter being developed by EADS, according to the company's website.

The charger is part of a complex system that uses a lithium-ion battery made by Japan's GS Yuasa Corp and electrical systems made by France's Thales to provide start up power for an auxiliary power unit, which is built by Pratt & Whitney, a unit of United Technologies.

A separate lithium-ion battery, which also uses a Securaplane charger and Thales electrical power conversion equipment, is used as a main battery backup for flight critical systems, according to Boeing.

The NTSB's decision to travel to Securaplane's facility sparked fresh questions about a fire that destroyed an administrative building there in 2006.

Boeing spokesman Marc Birtel said an investigation into the 2006 fire at the Securaplane facility was later determined to have been caused by an improper test set-up, not the battery design. He declined comment on the current 787 investigations.

← → C www.reuters.com/article/2013/01/21/us-boeing-securaplane-idUSBR90J08320130121

Fiona Greig, a spokeswoman for Securaplane, said the company had been invited to "contribute to the investigation process" and planned to fully support it.

Carney, Mario Draghi, Haruhiko Kuroda and U.S. Treasury Secretary Jacob Lew. The event will run from Jan 22 to 25.
Full Article: Full Coverage

Iran's Rouhani, Israel's Netanyahu due at Davos

DETROIT AUTO SHOW



REUTERS/PAUL INGRASSIA

The Big Three are back

Reuters Managing Editor Paul Ingrassia says the mood at the Detroit Auto Show five years ago was doom and gloom as the big three automakers faced bankruptcy. But in 2014, they're back in a big way. Video

Chrysler sees market share growth in 2014

Ford's aluminum car faces challenges



Boeing spokesman Marc Birtel said an investigation into the 2006 fire at the Securaplane facility was later determined to have been caused by an improper test set-up, not the battery design. He declined comment on the current 787 investigations.

After the fire, a former Securaplane employee named Michael Leon filed a claim for federal whistleblower protection, alleging that he was fired for raising security concerns about the design of the charger and discrepancies between assembly documents for the chargers and the finished chargers.

A federal administrative law judge dismissed Leon's suit in 2011, saying the company had proven he was fired for repeated misconduct, not any safety complaints. The judge did not rule on Leon's alleged safety concerns.

Greig confirmed the suit was filed and dismissed, but said the company could not discuss personnel issues.

Leon could not be reached for comment.

FAA spokeswoman Laura Brown said the FAA investigated Leon's complaints, but determined that the battery charging units that he addressed were prototypes, and none were installed in Boeing 787 aircraft.

"Our reviews also determined Securaplane's production of a particular printed circuit board complied with FAA requirements," Brown said.

(Reporting By Andrea Shalal-Esa; additional reporting by Brad Haynes in Brazil, and Noeleen Walder in New York; Editing by Maureen Baydek and Marguerita Choy)

EXHIBIT H

Member Center Alerts & Newsletters Jobs Cars Real Estate Rentals Weekly Circulars Local Directory

Los Angeles Times

LOCAL U.S. WORLD BUSINESS SPORTS ENTERTAINMENT HEALTH STYLE TRAVEL OPINION

[RELAXING](#)
[PHOTOS](#)
[VIDEO](#)
[CRIME](#)
[OBITUARIES](#)
[WEATHER](#)
[TRAFFIC](#)
[CROSSWORDS](#)
[SUDOKU](#)
[HOROSCOPES](#)
[APPS](#)
 Search

YOU ARE HERE: LAY Home -- Collections -- Lying

MORE STORIES ABOUT

Lying

Supreme Court (U.S.) -- Rulings

United States -- Government Employees

Perjury

Smallest Lie to Federal Agent Is a Crime, High Court Rules

January 27, 1998 | DAVID G. SAVAGE | TIMES STAFF WRITER

[Print](#)
[Email](#)
[Share](#)
[8/1/28](#)
[Invest](#)

WASHINGTON — The Supreme Court on Monday ruled that a single false statement to a federal agent, including a simple "no" to an accusation, can be punished as a crime.

The justices refused to make an exception for a person who, when confronted by a tax agent or federal investigator, denies he has done anything wrong.

The law makes it a crime to utter "any false statement" to a federal agent, and "the word 'no' in response to a question assuredly makes a statement," said Justice Antonin Scalia for the 7-2 majority.

Monday's decision in *Brogan v. U.S.*, 96-1579, marks the second time in two weeks that the justices have said honesty is the only policy for someone who comes under federal investigation.

Last week, the court said the Constitution does not give public employees a right to deny accusations that later turn out to be true. That 9-0 ruling reinstated various punishments of five federal employees who initially denied wrongdoing.

By coincidence, the two rulings come amid the uproar over whether President Clinton lied about his relationship with a former White House intern. Neither decision is likely to have a direct effect on the president's plight, because he has not been found to have lied.

Last week, the court said the Constitution does not give public employees a right to deny accusations that later turn out to be true. That 9-0 ruling reinstated various punishments of five federal employees who initially denied wrongdoing.

By coincidence, the two rulings come amid the uproar over whether President Clinton lied about his relationship with a former White House intern. Neither decision is likely to have a direct effect on the president's plight, because he has not been found to have lied.

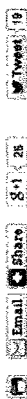
However, the court's opinions show that false statements of any sort can be punished, even when they are simple denials that are later shown to be untrue.

It has always been understood that a person who lies under oath can be charged with perjury.

Five years ago, the court went a step further and said anyone who lies on the witness stand and is later found guilty can get an increased sentence.

Justices John Paul Stevens and Stephen G. Breyer dissented.

Monday's ruling arose when a union official in Boston said "no" when asked by federal agents whether he had accepted bribes. When the truth came to light, he was prosecuted for taking bribes and making a false statement to federal agents.



FEATURED